

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ZHU ZHAI HOLDINGS LIMITED and)	
PETER PUI TAK LEE,)	
)	Case No. 20-cv-04985
Plaintiffs/Judgment Creditors,)	
)	
and)	Judge Sharon Johnson Coleman
)	
STEVEN IVANKOVICH,)	Hon Sidney I. Schenkier (Ret.)
Defendant/Judgment Debtor.)	Special Master

**WITNESS DISCLOSURE PURSUANT TO FEDERAL RULE OF CIVIL
PROCEDURE 26**

NOW COMES Intervenor, JEANETTE IVANKOVICH, by and through her counsel, SCHILLER DU CANTO & FLECK LLP, and for her Preliminary Witness Disclosure Pursuant to Federal Rule of Civil Procedure 26, states as follows:

1. **Steven Ivankovich**
791 Crandon Boulevard, PH 6
Key Biscayne, Florida 33149

Subject Matter: Mr. Ivankovich may be called to testify concerning any and all of his business dealings, as well as his personal history, including financials, spending and any other relevant information. Mr. Ivankovich may also be called as a witness for purposes of discussing and/or authenticating records and documents, which relate in any way to this matter, and he may also be called to testify regarding any issues raised in the deposition of the parties or any other third-party witness in this matter.

2. **Jeanette Ivankovich**
235 W. Menomonee Street
Chicago, Illinois 60614

Subject Matter: Mrs. Ivankovich may be called to testify as to her relationship with Mr. Ivankovich and any other information relevant to the parties' marriage. Mrs. Ivankovich may also be called as a witness for purposes of discussing and/or authenticating records and documents, which relate in any way to this matter and she may also be called to testify regarding any issues raised in the deposition of the parties or any other third-party witness in this matter.

3. **Gary A. Romaniello**
c/o Keith McKenna
McKenna Law Firm, LLC
11 Broadway, Suite 615
New York, New York 10004

Subject Matter: Mr. Romaniello may be called to testify concerning his business dealings, relationship, and history with Mr. Ivankovich. Mr. Romaniello may also be called as a witness for purposes of discussing and/or authenticating records and documents, which relate in any way to this matter and he may also be called to testify regarding any issues raised in the deposition of the parties or any other third-party witness in this matter.

General Disclosures

1. Jeanette reserves the right to call any witnesses identified on Plaintiff and/or Defendant's witness disclosure list, including any amendments thereto.
2. Jeanette reserves the right to call any rebuttal witnesses for purposes of rebutting any testimony brought forth by witnesses during Plaintiff and/or Defendant's case-in-chief.
3. In the event the authenticity of any documents produced and to be produced by Jeanette, Plaintiff, Defendant, and/or any third party in this case is questioned, Jeanette reserves the right to call a representative from any company, including banks, credit card companies, and any other financial institutions, to authenticate records and documents produced by Jeanette, Plaintiff, Defendant, and/or any third party during the pendency of this case, as well as to testify to the transactions reflected herein.

SCHILLER DU CANTO & FLECK LLP
Attorneys for Intervenor

/s/ Tanya J. Stanish

BY: TANYA J. STANISH

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